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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Michele Leuthauser,
Plaintiff,

v.

United States of America; Unknown
Transportation Security Administration
Officer,
Defendants.

Case No. 2:20-cv-00479-JCM-VCF

**Defendant's Unopposed
Motion for Extension of Time**

Defendant United States of America respectfully moves for a two-week extension of time, from September 8, 2023, to September 22, 2023, for the parties to file their respective status reports, per Minute Order, ECF No. 113. This is the first request for an extension of such deadline. Defense counsel has corresponded with Plaintiff's counsel, who advises that he has no objection to this requested extension.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. For the reasons set forth below, Defendant requests, and Plaintiff does not oppose, additional time for the parties to file their respective status reports.

1 The Ninth Circuit reversed and remanded this matter, with the Mandate recently
2 entered, *see* ECF No. 112. The district court ordered that each party file by September 8,
3 2023, a status report that includes the party's position on remand. *See* ECF No. 113.
4 Within the United States Attorney's Office, this case has been reassigned from former
5 AUSA Brianna Smith, who litigated the case, to AUSA Patrick Rose. AUSA Rose requests
6 additional time so that he may review the file, communicate with the client agency, and
7 communicate with Plaintiff's counsel before filing the requisite status report. AUSA Rose
8 will be out of the office September 6 and 7, 2023. The United States Attorney's Office
9 remains very busy with three civil AUSA vacancies. Based on these circumstances,
10 Defendant respectfully requests a two-week extension of time, from September 8, 2023, to
11 September 22, 2023, for the parties to file their respective status reports, per Minute Order,
12 ECF No. 113.

13 Respectfully submitted this 5th day of September 2023.

14 JASON M. FRIERSON
15 United States Attorney

16 /s/ Patrick A. Rose
17 PATRICK A. ROSE
18 Assistant United States Attorney

19 **IT IS SO ORDERED**

20
21 UNITED STATES DISTRICT JUDGE
22 UNITED STATES MAGISTRATE JUDGE

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24 **DATED:** _____
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